

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
TAMPA DIVISION**

**ALVA JOHNSON**, individually and on  
behalf of all others similarly situated,

**Plaintiff,**

v.

**Case No. 8:19-cv-00475-T-02SPF**

**DONALD J. TRUMP,**  
in his individual capacity and  
**DONALD J. TRUMP FOR**  
**PRESIDENT, INC.,**

**Defendants.**

\_\_\_\_\_ /

**JOINT MOTION TO EXTEND DEADLINES**

Plaintiff Alva Johnson and Defendants Donald J. Trump (“Mr. Trump”) and Donald J. Trump for President, Inc. (“the Campaign”) (collectively, “the Parties”), through counsel and for good cause shown, jointly request that the Court grant a one week extension of the deadlines set forth in Dkt. 81-2 par. 9 (as previously extended for thirty days by Dkt. 93) as follows:

<b>EVENT</b>	<b>CURRENT DEADLINE</b>	<b>PROPOSED EXTENDED DEADLINE</b>
Plaintiff's Amended Complaint	August 28, 2019	September 4, 2019
Plaintiff's Opposition to the Motion for a Protective Order (Dkt. 73)	September 6, 2019	September 13, 2019
Defendants' Motion to Maintain Confidentiality Designations	September 11, 2019	September 18, 2019
Campaign's Responses to Ms. Johnson's Third Requests for Production of Documents	September 11, 2019	September 18, 2019
Campaign's Responses to Ms. Johnson's Meet-and-Confer Letters	September 11, 2019	September 18, 2019

This motion is brought in good faith and not for purposes of delay.

Dated: August 27, 2019

Respectfully Submitted,

/s/ Hassan A. Zavareei  
Hassan A. Zavareei (*pro hac vice*)  
Katherine M. Aizpuru (*pro hac vice*)  
TYCKO & ZAVAREEI LLP  
1828 L Street, N.W., Suite 1000  
Washington, D.C. 20036  
Telephone: 202-973-0900  
Facsimile: 202-973-0950  
hzavareei@tzlegal.com  
kaizpuru@tzlegal.com

Janet Varnell (Fla. Bar No. 71072)  
Brian W. Warwick, (Fla. Bar No. 0605573)  
VARNELL & WARWICK, PA  
P.O. Box 1870  
Lady Lake, FL 32158-1870  
P: 352-753-8600  
F: 352-503-3301  
jvarnell@varnellandwarwick.com  
bwarwick@varnellandwarwick.com

F. Paul Bland (*pro hac vice*)  
Karla Gilbride (*pro hac vice*)  
PUBLIC JUSTICE, P.C.  
1620 L Street NW, Suite 630  
Washington, DC 20036  
(202) 797-8600

Jennifer Bennett (*pro hac vice*)  
PUBLIC JUSTICE, P.C.  
475 14th Street, Suite 610  
Oakland, CA 94612  
(510) 622-8150

*Counsel for Plaintiff*

/s/ Ryan J. Stonerock  
Charles J. Harder (*Pro Hac Vice*)  
Trial Counsel  
Ryan J. Stonerock (*Pro Hac Vice*)  
HARDER LLP  
132 S. Rodeo Drive, Fourth Floor  
Beverly Hills, California 90212  
Telephone: (424) 203-1600  
Facsimile: (424) 203-1601

CHarder@HarderLLP.com  
RStonerock@HarderLLP.com

Dawn Siler-Nixon  
Florida Bar No. 993360  
DSiler-Nixon@FordHarrison.com  
Tracey K. Jaensch  
Florida Bar No. 907057  
TJaensch@FordHarrison.com  
**FORDHARRISON LLP**  
101 E. Kennedy Blvd., Suite 900  
Tampa, Florida 33602  
Telephone: (813) 261-7800  
Facsimile: (813) 261-7899

*Attorneys for Defendants*  
*Donald J. Trump and*  
*Donald J. Trump for President, Inc.*